

### REMARKS

The application has been carefully reviewed in light of the Office Action dated February 15, 2008. Claim 22 is currently canceled. Claims 1, 6, 7, 10, 11, 13, 14, 16, 18, 21, 23, 24, 26, 27, 29, and 31 are currently amended. Claims 36-40 are currently added. Claims 1-3, 6, 7, 10-14, 16-21, 23, 24, 26-31 and 33-40 are pending in the application. Claims 33-35 are allowed. Applicant submits that no new matter is added to the application by the claim amendments or by the newly added claims. Applicant respectfully requests reconsideration of the claims in accordance with the following remarks.

#### *Allowable Subject Matter*

Applicant thanks the Examiner for the indication that Claims 33-35 are allowable.

#### *Claim Rejections – 35 U.S.C. § 102*

Claims 1-3, 6-7, 10-14, 16-24 and 26-31 stand rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,523,026 to *Gillis* (“*Gillis*”). Applicant respectfully traverses these rejections.

Claim 1, as amended, recites: “defining a semantic vector for each document based on the linguistic analysis, said semantic vector having multiple components, wherein each component of said semantic vector has at least: a term included in the document or a synonym of said term; a weighting factor relating to an importance of said term; and a frequency value relating to a number of occurrences of said term.”

Thus, the frequency value relates to the number of occurrences of a term in a document. For example, in some implementations, a term that appears many times in a document is associated with a high frequency value, while a term that appears fewer times in the document is associated with a lower frequency value. The weighting factor relates to the importance of the term. For example, in some implementations, a term that appears in the first or last 15% of the document is associated with a high weighting value, while a term that appears outside of the first or last 15% of the document is associated with a lower weighting value.

However, the Office Action does not show that *Gillis* teaches at least the limitation of a weighting factor relating to an importance of a term. *Gillis* describes “frequency related weightings,” which are values related to how frequently a term appears in a training corpus (*Gillis*, 41:39-56). The Office Action does not show that the frequency related weightings of *Gillis* are related to the importance of a term, as required by claim 1.

For at least these reasons, the rejection of claim 1 is deficient, and claim 1 is therefore allowable over *Gillis*. Claims 2, 3, 6, 7, 10-13, 36 and 37 depend from claim 1 and are allowable over *Gillis* for at least the same reasons that claim 1 is allowable over *Gillis*. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-3, 6, 7, and 10-13.

Claim 14, as amended, recites “linguistically analyzing two or more documents to identify at least one term group in each document, each term group comprising a main term and at least one subordinate term semantically related to the main term; generating a semantic vector associated with each document, the semantic vector comprising a plurality of components, each component including: a term group in the document; a frequency value relating to a number of occurrences of the term group; and a weighting factor relating to an importance of at least part of the term group.”

As discussed above with regard to claim 1, the Office Action has not shown that *Gillis* teaches a weighting factor relating to an importance of a term. Similarly, the Office Action has not shown that *Gillis* teaches a weighting factor relating to an importance of at least part of a term group that includes a main term and at least one subordinate term semantically related to the main term. Furthermore, the Office Action has not shown that *Gillis* teaches a frequency value relating to a number of occurrences of the term group.

For at least these reasons, the rejection of claim 14 is deficient, and claim 14 is therefore allowable over *Gillis*. Claims 16-21 and 38-40 depend from claim 14 and are allowable over *Gillis* for at least the same reasons that claim 14 is allowable over *Gillis*. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 14 and 16-21.

Claim 27, as amended, recites, *inter alia*, “means for causing a computer to ... compare the semantic vectors using a defined metric, wherein said metric measures the semantic distance

between two semantic vectors as a function of at least the weighting factors included in the two semantic vectors.”

As discussed above with regard to claim 14, the Office Action has not shown that *Gillis* teaches a weighting factor relating to an importance of at least part of a term group that includes a main term and at least one subordinate term semantically related to the main term. Similarly, the Office Action has not shown that *Gillis* teaches a metric that measures the semantic distance between two semantic vectors as a function of the weighting factors.

For at least these reasons, the rejection of claim 27 is deficient, and claim 27 is therefore allowable over *Gillis*. Claims 28-31 depend from claim 27 and are allowable over *Gillis* for at least the same reasons that claim 27 is allowable over *Gillis*. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 27-31.

Claim 23, as amended, recites, *inter alia*, “a weighting factor relating to an importance of at least part of the term group” and “wherein said defined algorithm measures the semantic distance between two documents as a function of at least the weighting factors associated with the quantified representations for the two documents.” For at least the reasons discussed above with respect to claims 1, 14, and 27, claim 23 is allowable over *Gillis*. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 23.

Claim 24, as amended, recites “a weighting factor relating to an importance of at least part of the term group.” For at least the reasons discussed above with respect to claims 1 and 14, claim 24 is allowable over *Gillis*. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 24.

Claim 26 recites “a weighting factor relating to an importance of at least part of the term group.” For at least the reasons discussed above with respect to claims 1 and 14, claim 26 is allowable over *Gillis*. Accordingly, Applicants respectfully request withdrawal of the rejection of claim 26.

### CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue, or comment does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the above, and for other reasons clearly apparent, Applicant respectfully submits that the Application is in condition for allowance, and requests such a Notice. If the present Application is not allowed and/or if one or more of the rejections is maintained or made final, Applicant hereby requests a telephone conference with the Examiner and further requests that the Examiner contact the undersigned agent to schedule a telephone conference.

No fees are believed due at this time. Please apply any other charges or credits to deposit account 05-0765.

Respectfully submitted,

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